

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

DAVID ISRAEL,	)	Case No. 17-cv-06452
	)	
Plaintiff,	)	
	)	Honorable Charles R. Norgle, Sr.
v.	)	Room 2341
	)	
MICHAEL BUCON, individually and	)	
as agent of James Adams and Xtreme	)	
Protection Services, LLC, JAMES	)	Magistrate Judge Maria Valdez
ADAMS, individually and as agent of	)	Room 1041
Xtreme Protection Services, LLC and	)	
XTREME PROTECTION SERVICES,	)	
LLC,	)	
	)	
Defendants.	)	

**AGREED MOTION FOR ENTRY OF JUDGMENT**

NOW COMES Plaintiff, David Israel (“David” or “Plaintiff”), through his attorneys, Ariel Weissberg, Devvrat Sinha and the law firm of Weissberg and Associates, Ltd., and as Plaintiff’s *Agreed Motion for Entry of Judgment*, states as follows:

1. On September 7, 2017, Defendants James Adams (“Adams”) and Xtreme Protection Services, LLC (“Xtreme”), with the written consent of Defendant Michael Bucon (“Bucon”), (collectively, “Defendants”) filed a Notice of Removal to remove the state court action captioned as, *David Israel v. Michael Bucon, individually and as agent of James Adams and Xtreme Protection Services, LLC, James Adams, individually and as agent of Xtreme Protection Services, LLC and Xtreme Protection Services, LLC*, 17-L-006026 (“State Court Case”), to the United States District Court for the Northern District of Illinois, Eastern Division.

2. At the time that the Notice of Removal was filed, there was pending Plaintiff’s Amended Verified Third Amended Complaint (“Third Amended Complaint”).

3. Pursuant to the Third Amended Complaint, Plaintiff pleaded six causes of action against Defendants as follows:

- a. Count I: Eavesdropping in violation of 720 ILCS 5/14-2 against Defendants Bucon, Adams and Xtreme;
- b. Count II: Intentional Infliction of Emotional Distress against Defendants Bucon, Adams and Xtreme;
- c. Count III: Outrage against Defendants Bucon, Adams and Xtreme;
- d. Count IV: Recovery of Civil Damages Pursuant to 18 U.S.C. §2520 (Federal Wiretapping Act) against Defendants Bucon, Adams and Xtreme;
- e. Count V: Intrusion Upon Seclusion against Defendants Bucon, Adams and Xtreme; and
- f. Count VI: Trespass against Defendants Bucon, Adams and Xtreme.

These claims emanate from actions taken against David in the summer of 2015, when Bucon, at the direction of Adams and Xtreme, texted David threatening messages indicating he was following him, placed GPS tracking devices on David's BMW M6 and Jeep Grand Cherokee, and placed two different eavesdropping devices at David's Learsi Office, located at 3100 Dundee Road, Suite Number 308, in Northbrook, Illinois. All of these actions were taken to intimidate David and to cause intentional emotional and potentially physical harm to David.

4. Plaintiff and Defendant, Michael Bucon have engaged in substantive settlement discussions and are in agreement that this Court should enter a Judgment in favor of Plaintiff and against Defendant, Michael Bucon in the amount of \$50,000.00.

5. In light of the foregoing, this Court should enter a Judgment in favor of Plaintiff and against Defendant, Michael Bucon in the amount of \$50,000.00.

WHEREFORE, Plaintiff, David Israel, prays that this Court enter an Order:

(a) enter a Judgment in favor of Plaintiff and against Defendant, Michael Bucon in the amount of \$50,000.00;

(b) withdraw the pending Plaintiff's Motion for Default Judgment Against Michael Bucon (DE 41); and,

(c) for such other and further relief as this Court deems just and proper.

**DAVID ISRAEL**, Plaintiff

By: /s/ Ariel Weissberg  
One of his attorneys

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